

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

TIERRA TELECOM, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:10cv95 (TSE/JFA)
)	
LEVEL 3 COMMUNICATIONS, INC. <i>et al.</i> ,)	JURY DEMANDED
)	
)	
Defendants.)	
)	
)	

**PLAINTIFF TIERRA TELECOM, INC.'S MOTION FOR ENTRY OF A
PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Tierra Telecom, Inc. respectfully moves this Court for entry of a protective order. The grounds for this motion are set forth in the accompanying memorandum of law.

Pursuant to Local Rule 7(E), counsel for the parties met and conferred on April 8 and 9, 2010, in a good faith effort to narrow the issues of disagreement.

Dated: April 9, 2010

/s/ Coke Morgan Stewart

Alan M. Fisch (*pro hac vice*)

Jason F. Hoffman (*pro hac vice*)

Coke Morgan Stewart (*Va. Bar No. 41933*)

R. William Sigler (*Va. Bar No. 65940*)

KAYE SCHOLER LLP

The McPherson Building

901 Fifteenth Street, NW

Washington, DC 20005-2327

Phone: 202-682-3500

Fax: 202-682-3580

Email: alan.fisch@kayescholer.com

Email: jason.hoffman@kayescholer.com

Email: coke.stewart@kayescholer.com

Email: bill.sigler@kayescholer.com

Attorneys for Tierra Telecom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2010, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Kimberly S. Walker
David Marion Foster
FULBRIGHT & JAWORSKI LLP
801 Pennsylvania Avenue NW
Washington, DC 20004-2623
kwalker@fulbright.com
dfoster@fulbright.com

Attorneys for Level 3 Communications, LLC

Jonathan G. Graves
Robert D. Spendlove
Phillip E. Morton
COOLEY GODWARD KRONISH LLP
One Freedom Square
Reston Town Center
11951 Freedom Drive
jgraves@cooley.com
rspendlove@cooley.com
pmorton@cooley.com

*Attorneys for Qwest Communications
Company, LLC*

Richard D. Rochford
NIXON PEABODY LLP
1100 Clinton Square
Rochester, New York 14604
rrochford@nixonpeabody.com

Louis E. Dolan, Jr.
NIXON PEABODY LLP
401 Ninth Street NW
Suite 900
Washington, DC 20004-2128
ldolan@nixonpeabody.com

Dabney J. Carr, IV
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, VA 23219
dabney.carr@troutmansanders.com

*Attorneys for Global Crossing
Telecommunications, Inc.*

/s/ Coke Morgan Stewart

Coke Morgan Stewart
Va. Bar No. 41933
KAYE SCHOLER LLP
The McPherson Building
901 Fifteenth Street, NW
Washington, DC 20005-2327
Phone: 202-682-3500
Fax: 202-682-3580
Email: coke.stewart@kayescholer.com

Attorney for Tierra Telecom, Inc.